



100 Duffy Ave., Suite 510

Hicksville, NY 11801

Tel.: 929.324.0717

Fax: 929.333.7774

E-mail: mars@khaimovlaw.com

Mars Khaimov Law, PLLC

June 26, 2024

VIA ECF

Honorable Judge Lewis J. Liman
 Southern District of New York
 Daniel Patrick Moynihan
 United States Courthouse
 500 Pearl St.
 New York, NY 10007-1312

Plaintiff has demonstrated good cause for an extension of the time to serve the Defendant. Plaintiff shall serve Defendant by no later than August 9, 2024. The initial pretrial conference is hereby adjourned to September 27, 2024 at 2 P.M.

DATE: June 27, 2024

SO ORDERED.

LEWIS J. LIMAN
 United States District Judge

Re: Case 1:24-cv-02258-LJL - *Toro v. Wildfish Cannery, LLC*
Plaintiff's Letter Motion for Additional Time to Effectuate Service and to Adjourn Initial Pretrial Conference

Dear Judge Liman:

This office represents the Plaintiff in the above styled action. Plaintiff respectfully submits this letter motion seeking the following: an extension of time to serve the Defendant. This lawsuit was filed on March 26, 2024. Rule 4 of the Federal Rules of Civil Procedure requires service of process 90 days after the complaint has been filed. Thus, the deadline expired on June 25, 2024. Our office has been instructed by three (3) different process serving providers that they do not have any servers in the remote location of Defendant in Alaska, but we are diligently working to effectuate service. As such, Plaintiff requests an additional 45 days from June 25, 2024, to serve the Defendant, of up to and until August 9, 2024.

Further, since service has not yet been completed, Plaintiff additionally requests that the initial pretrial conference scheduled for August 5, 2024 to be adjourned to a date in September of 2024 or later.

This is the first time both requests are being made, and since Plaintiff's counsel is not yet in communication with the Defendant, these requests are not with the consents of Defendant.

We thank Your Honor for the attention and consideration herein.

Respectfully submitted,

/s/ Mars Khaimov
 Attorneys for Plaintiff

Cc: all Counsel of record on ECF

